

UNITED STATES DISTRICT COURT FOR THE

SOUTHERN DISTRICT OF TEXAS

LAREDO DIVISION

United States District Court
Southern District of Texas
FILED

MMM

JUN - 6 2006

Michael N. Milby, Clerk
Laredo Division

UNITED STATES OF AMERICA

V.

JORGE A. SANCHEZ

Defendant

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§

CR. NO. L-06-698

FACTUAL BASIS FOR GUILTY PLEA

TO THE HONORABLE COURT:

The United States of America, by and through the United States Attorney for the Southern District of Texas and the undersigned Assistant United States Attorney, and the defendant and his counsel, hereby stipulate to the following:

I.

If this case had proceeded to trial, the Government would have proved by legal and competent evidence that on April 14, 2006, the defendant **JORGE A. SANCHEZ** arrived at the International Port of Entry Bridge II in Laredo, Texas driving a 2004 Nissan Sentra with Texas plates. The primary Customs and Border Protection ("CBP") Officer referred the vehicle to secondary inspection because of a positive TECS hit to be on the lookout for this license plate trafficking narcotics. Upon secondary inspection, a narcotic detecting dog positively alerted for the presence of narcotics in the dashboard area of the vehicle. A nonintrusive X-Ray inspection revealed abnormalities in the firewall of the vehicle. Further intensive inspection in this area resulted in the CBP officers discovering 14 bundles of cocaine hidden in the firewall of the vehicle with a total

gross weight of 16.60 kilograms.

Under rights advisement and waiver, the defendant admitted to Immigration and Customs Enforcement ("ICE") Agents that he knew that the vehicle he was driving contained narcotics and further admitted that he was going to be paid \$1,000 U.S. Dollars to deliver the vehicle to a pre-determined location in Laredo, Texas.

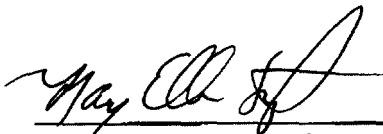
II.

The defendant and his counsel, having read the foregoing stipulation of facts, agree that these facts are true and correct and are approved by signing this document.

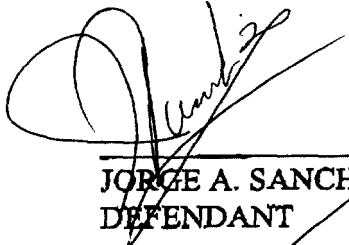
Respectfully Submitted,

DONALD J. DeGABRIELLE, JR.
UNITED STATES ATTORNEY

By:


DIANA M. H. SONG
Assistant United States Attorney

APPROVED:


JORGE A. SANCHEZ
DEFENDANT


LUIS ANTONIO FIGUEROA
ATTORNEY FOR DEFENDANT

Date: 6/6/06

Date: 6/6/06